

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
CORRECTED ADMINISTRATIVE
MOTION TO FILE PORTIONS OF ITS
OFFER OF PROOF REGARDING
DEFENDANTS' TRADE SECRET
MISAPPROPRIATION**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal Portions of Its Offer of Proof Regarding Defendants’ Trade Secret Misappropriation (“Waymo’s
8 Offer of Proof”), filed concurrently herewith (the “Administrative Motion”). The Administrative
9 Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Offer of Proof	Highlighted portions	Waymo (green highlighting), Defendants (blue highlighting), third party Velodyne (yellow highlighting), and third parties related to the ownership of Tyto LiDAR (red highlighting)

17
18 3. Specifically, the green highlighted portions of Waymo’s Offer of Proof contain or refer
19 to trade secret information, which Waymo seeks to seal.

20 4. The green highlighted portions of Waymo’s Offer of Proof contain, reference, and/or
21 describe Waymo’s trade secrets. The information Waymo seeks to seal includes the confidential
22 design and functionality of Waymo’s proprietary autonomous vehicle system, including its LiDAR
23 designs, which Waymo maintains as secret. I understand that these trade secrets are maintained as
24 secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-
25 31). The public disclosure of this information would give Waymo’s competitors access to
26 descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such
27 information were made public, I understand that Waymo’s competitive standing would be
28 significantly harmed.

